## STATE OF SOUTH CAROLINA

## BEFORE THE PUBLIC SERVICE COMMISSION

**DOCKET NO. 2019-185-E DOCKET NO. 2019-186-E** 

In the Matter of: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish MOTION FOR EXTENSION OF TIME TO Duke Energy Carolinas, LLC's FILE PROPOSED ORDER OF THE Standard Offer, Avoided Cost SOUTHERN ALLIANCE FOR CLEAN Methodologies, Form Contract **ENERGY AND SOUTH CAROLINA** COASTAL CONSERVATION LEAGUE Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A), and South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Progress, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) - S.C. Code Ann. Section 58-41-20(A)

Appellants South Carolina Coastal Conservation League ("CCL") and Southern Alliance for Clean Energy ("SACE) respectfully move this Court for an extension of time to file their proposed order in the above-referenced proceedings. In support of this Motion, CCL and SACE

state as follows:

 Counsel for SACE and CCL were made aware this afternoon that they have misunderstood the recent directives regarding proposed order due dates in the avoided cost proceedings.

2. It was counsel's understanding that all proposed orders were due by 8:16am on Nov. 12. But we now understand that this date and time was meant for the 2019-184-E proceeding alone, and not the 185-E and 186-E proceedings.

3. We have inquired with other counsel in the 2019-185-E and 186-E proceedings as to whether their clients would oppose an extension for CCL/SACE's proposed order and the following parties have signaled that they do not oppose this request: Duke Energy Carolinas and Duke Energy Progress, Office of Regulatory Staff, Johnson Development Associates, SC Solar Business Alliance, and SC Energy Users Committee.

Accordingly, CCL and SACE respectfully request an extension for CCL/SACE's proposed order to 8:16am on Nov. 12 for the 2019-185-E and 186-E proceedings based on this misunderstanding and the representation by other parties that they do not object to this extension given the misunderstanding.

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